



**POINT LONELY SRRS
ALASKA**

**ADMINISTRATIVE RECORD
COVER SHEET**

AR File Number 13

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File: 17A-35-2 OR
S.H. 17A-35-2
(907) 452-1714 13
DEPT. OF ENVIRONMENTAL CONSERVATION

February 8, 1990

Northern Regional Office
1001 Noble Street
Suite 350
Fairbanks, Alaska 99701

Ms. Kathy Port
HQ-TAC-DEEV-3/8
Bldg. 681
Langley AFB, VA 23665

Dear Ms. Port

Re: Installation Restoration Program, Remedial
Investigation/Feasibility Study for Barter Island
Bullen Point, and Point Lonely Air Force Stations.

The Alaska Department of Environmental Conservation (ADEC) has completed its review of the Remedial Investigation/Feasibility Study (RI/FS) prepared for Barter Island AFS (BAR-M), Bullen Point AFS (POW-3), and Point Lonely AFS (POW-1). The procedures followed to screen remedial actions for contaminated sites at these locations do not consider the State of Alaska Water Quality Standards (WQS) and in particular 18 AAC 70.010.(c). Surface water/leachate samples collected from some of the sites indicate that total petroleum hydrocarbons (TPH), and total aromatic hydrocarbons concentration exceed the allowable limits, therefore, necessitating determination of the source(s) and corrective actions. Our comments follow:

BAR-M

Sewage Lagoon

Surface water/leachate samples collected at this site indicate the presence of coliform bacteria at 1100 and 4000 MPN/100 ml which represents a health hazard and is contrary to the State of Alaska WQS 18 AAC 70.020 and Waste Water Disposal Regulation 18 AAC 72.010(a). Woodward-Clyde consultants (WCC) classifies this site as category 1 which means no further IRP action is required. Furthermore, the department has issued a waste water disposal permit for this site (permit 8936-DB008), and the above leachate is not one of the provisions addressed in the permit. We disagree with the no action alternative based on the above regulations and recommend remedial action be explored and utilized.

New Landfill

According to the WCC report the average flow (seepage) out of the North side of the New Landfill due to precipitation is estimated at 1400 gallons/day (section 3-14). This seepage is about half the cumulative flow from the North berm. Surface water/leachate sample

results indicate presence of total aromatic hydrocarbons at concentrations higher than 10 ppb which is the standard set by the WQS. Again, the no remedial action alternative proposed for this site is not acceptable by the department. Since the waste in the landfill are the likely source of the water contamination, and surface water leaching through the wastes, effort should be made to rectify the problem.

Old Landfill

Per correspondence between the ADEC and the U.S. Air Force (USAF) dated April 29, 1988, the department expressed its concern over the fact that the Beaufort Sea is reclaiming portion of the Barter Island where the Old landfill is located. In the same letter, remedial action for stabilization of the eroding area and collection of material washed away from the landfill were recommended. Moreover, disposal of waste into the water of the state requires a permit per AS 46.03.100. The department would like to reiterate its recommendation of a remedial action.

POL Catchment and Contaminated Ditch

The surface water/leachate sample results reported for these two sites indicate that total hydrocarbons in the water column exceed the WQS. Soil/sediment samples result from these sites do not show TPH contamination, therefore, remedial action at other locations at BAR-M may eliminate the problem at the POL Catchment and Contaminated Ditch.

POW-3

POL Tanks

Visual inspection of the tanks as described in the RI/FS report indicate that the surface of the seven fuel tanks were severely deteriorated and the nearby soil surface showed some signs of rust stains (WCC report, March, 1988, and April, 1989). The exact content of the tanks is unknown and the liquid level gages indicate less than 4-6 inches of product is in the tanks. Since corrosion may eventually expose inside of the tanks, we believe that further actions are necessary to prevent future problems.

POW-1

Husky Landfill

The WCC report dated March 1988 indicates leachate of oily looking and discolored liquids from the west side of the landfill. The report also indicates that gas bubbles appeared when the effluent was disturbed. Surface water/leachate samples collected from this site on August 1988, demonstrate the presence of total aromatic hydrocarbons at concentrations in excess of 15 ppb. Moreover, one of the soil/sediment samples collected at this site shows the presence of total petroleum hydrocarbons at a concentration of 1300 mg/kg. The Husky Landfill apparently has received wastes such as

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solvents and waste oils (WCC report, March, 1988). The presence of sink holes on the landfill's gravel pad may contribute to the seepage contamination at the west side berm, since water drained through this sink holes may come in contact with the buried waste. Based on the facts indicated above the department does not accept the no action alternative and recommends a remedial action that will result in a permanent solution of this problem.

Old Landfill

The report dated March, 1988, indicate that this inactive landfill is eroding and the debris are exposed and it extends into the lagoon. The department in its correspondence with the USAF dated April 29, 1988, suggested stabilization of the landfill, if the material(waste) are being discharged into the lagoon. The ADEC would like the USAF to address the above issue.

Old Sewage Outfall

Surface water/leachate and soil/sediment sample results from this site indicate presence of total petroleum hydrocarbons at concentrations as high as 6000 ppb, and 1300 mg/kg. respectively. The department does not accept the no action alternative chosen for this site based on 18 ACC 70.010.(c) and 18 ACC .70.020., therefore corrective actions should be sought.

Large Fuel Spill

Soil/sediments and surface water/leachate results sample results indicate TPH concentrations as high as 25000 mg/kg and 3000 ppb respectively. The remedial action sought for the fuel spill area is acceptable, but in order to eliminate the water contamination, soil cleanup level up of 100 mg/kg should be attained. We also would like to remind you that state of Alaska considers surface waters within the state jurisdiction as a source of fresh water.

POL Storage Area

Surface water/leachate sample results show TPH concentration at 2000 ppb, which is again over the limits set by the WQS. Soil/sediment sample results indicate TPH levels in the range of 40 to 5400 mg/kg., again, we believe that soil cleanup level of 100 mg/kg should be achieved.

If you have any question regarding this matter please contact myself or Brad Fristoe at the telephone number listed on the previous page.

Sincerely,

Mehrdad Nadem
Environmental Field Officer

mn/rg

cc: W. McGee ADEC/Fairbanks
B. Fristoe ADEC/Fairbanks
Captain Schmidt USAF/Brooks AFB

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